

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

IN THE MATTER OF A CRIMINAL	)	CASE NO. 3:20MJ5282
COMPLAINT AND ARREST	)	
WARRANT FOR RONALD E. GRAB	)	
	)	

---

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Sara Pedersen, being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of a criminal complaint and arrest warrant of Ronald E. Grab, DOB: 12/12/1946, SSN: 299-40-5714, residence at 5485 County Road 5, Delta, Ohio 43515 for violating 18 U.S.C. § 922(o) and 26 U.S.C. § 5861(d).

2. I am a Special Agent (“SA”) of the Federal Bureau of Investigation (the “FBI”), and as such, I am an investigative or law enforcement officer of the United States within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure. I am engaged in the enforcement of criminal laws and am within a category of officers authorized by the Attorney General to request and execute search and arrest warrants pursuant to Title 18 U.S.C. §§ 3052 and 3107; and DOJ regulations set forth at Title 28 C.F.R. §§ 0.85 and 60.2(a).

3. I am a Special Agent with the FBI and have been since June of 2014. I am currently assigned to the Toledo Resident Agency in the Cleveland Division. My educational background includes study in the field of criminal justice, psychology, and the law. Prior to becoming a Special Agent, I worked as a criminal defense attorney for approximately six years at the state court level.

4. My experience as an FBI agent includes the investigation of national-security cases involving individuals seeking to travel overseas to commit violent jihad, those who have participated in terrorist fundraising, those who desire to commit domestic acts of terrorism, and those who have sought to commit acts of violence in the United States. Additionally, I have completed FBI administered counterterrorism classroom and online training at the FBI Academy and at other FBI facilities.

5. My experience as an FBI agent also includes the investigation of criminal cases, including racketeering, healthcare fraud, crimes against children, murder, kidnapping, and drug trafficking.

6. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, officers, and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested criminal complaint and arrest warrant and does not set forth all of my knowledge about this matter.

7. Based on my training and experience and the facts set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 922(o) – Possession of machinegun; and 26 U.S.C. § 5861(d) - Possession of an unregistered machinegun or destructive device have been committed by Ronald E. Grab.

#### **STATUTORY AUTHORITY**

8. **Title 18, United States Code, Section 922(o)** states it is unlawful for any person to transfer or possess a machinegun. For this subsection, a “machinegun” means any weapon which shoots, is designed to shoot, or can be readily restored to shoot, automatically more than one shot, without manual reloading, by a single function of the trigger. The term shall also include the frame or receiver of any such weapon, any part designed and intended solely and

exclusively, or combination of parts designed and intended, for use in converting a weapon into a machinegun, and any combination of parts from which a machinegun can be assembled if such parts are in the possession or under the control of a person.

9. **Title 26, United States Code, Section 5861(d)** states it is unlawful to receive or possess a firearm which is not registered to him in the National Firearms Registration and Transfer Record. For this subsection, a “firearm” includes a machinegun and destructive device.

**PROBABLE CAUSE**

10. On September 10, 2020, United States Magistrate Judge James Knepp II authorized a search warrant for a residence on 5485 County Road 5, Delta, Ohio 43515. Law enforcement confirmed that Grab owned this property and it contains a single family dwelling. This is the only property owned by Grab. On September 8 and September 9, 2020, law enforcement conducted surveillance at this address and observed Grab there and confirmed he lived there. Additionally, Grab registered two vehicles in his name at that address.

11. On September 11, 2020, law enforcement executed a search warrant at Grab’s residence located at 5485 County Road 5, Delta, Ohio. During the search, they found an AR-15 receiver. The receiver is labeled SQS15; cal multi; BCI 06373; BCI Defense; Bremen, IN; USA.

12. On September 11, 2020, ATF Special Agent Joseph Delucio examined the above-stated receiver (BCI Defense, model SQS15, and serial number BCI06373). SA Delucio determined the lower receiver had components commonly found on an M16 fully automatic rifle, namely an automatic hammer and auto-auto sear. SA Delucio found the selector switch capable of moving to the 3 o’clock position, a position often used for fully automatic fire. SA Delucio conducted a function test on the lower receiver, using the upper receiver and the bolt carrier group of another AR-15 style rifle recovered in the above-stated search. SA Delucio executed a

function test and confirmed the firearm operated in a manner consistent with fully automatic fire. In SA Delucio's opinion, the lower receiver meets the federal definition of a machinegun.

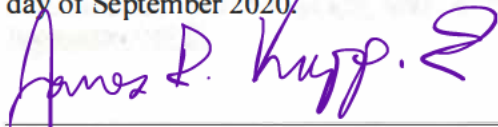
13. ATF confirmed that Grab has no firearm registration records for any gun.

**CONCLUSION**

14. Based on the foregoing facts and circumstances, there is probable cause to believe that Ronald E. Grab has committed a violation of Title 18, United States Code, Section 922(o), that is possession of a machinegun, and Title 26, United States Code, Section 5861(d) that is possession of a firearm which is not registered in the National Firearms Registration and Transfer Record. As such, your Affiant requests that a criminal complaint and arrest warrant be issued.

  
\_\_\_\_\_  
Special Agent Sara Pedersen (FBI)

Subscribed and sworn to me telephonically after submission by reliable electronic means, this 14<sup>th</sup> day of September 2020.

  
\_\_\_\_\_  
Honorable James R. Knepp, II  
UNITED STATES MAGISTRATE JUDGE